IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA

MACON COUNTY INVESTMENTS, INC. and REACH ONE, TEACH ONE OF AMERICA, INC.,	)	
Plaintiffs,	)	
v.	)	**Civil Action No.: 3:06-cv-224-WKW**
SHERIFF DAVID WARREN, in his official capacity as the SHERIFF OF MACON COUNTY, ALABAMA,	)	
Defendant.	)	

PLAINTIFFS' SECOND SET OF REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT SHERIFF WARREN

COME NOW the Plaintiffs pursuant to Rule 34 of the Federal Rules of Civil Procedure and hereby request that the Defendant respond to the following Request for Production of Documents.

DEFINITIONS

1. As used herein, the term "DESCRIBE" means to provide details of explanation with regard to the stated subject, stating all facts supporting the given reason.

2. As used herein, the definition for the term "DOCUMENT(S)" means without limitation, the following items, whether printed or recorded or reproduced by any other mechanical process, or written or produced by hand: agreements, contracts; communications; correspondence; letters; telegrams; tape recordings; e-mails; memoranda; notes; summaries or other recordings of telephone conversations, personal conversations or meetings; agenda of meetings; notices; records; bid records; personal memoranda; photographs; slides; motion picture films; charts; graphs; diagrams; reports; statements of witnesses; findings of investigations; files;

reports of experts; reports of consultants; papers; books; records; summaries; and any and every other writing or other graphic means by which human intelligence is in any way transmitted or reported.

3. Any document which contains any comment, notation, addition, or marking which is not a part of the original document is to be considered a separate document.

4. A request to "IDENTIFY" a person or individual means to state his or her name, race, sex, age, rank or title, if any, present home and business address and present home and business telephone number.

5. A request to "IDENTIFY" a writing or document means a request either to attach such as an exhibit to your answers to these interrogatories, or to describe with sufficient specificity that it may be made the subject of a request for production of documents. Your description should include, without limitation, an indication of: (a) the author; (b) addressee(s); (c) copy recipients; (d) date; (e) the nature of the writing or document (e.g. letter, telephone memorandum, audio tape recording, photograph, etc.); (f) a summary or description of the contents; and (g) the present location and custodian thereof for each existing copy.

6. A request to "IDENTIFY" an oral communication shall mean a request to describe the communication with particularity, and shall include, without limitation, the following information: (a) the identity of all parties to the communication; (b) the identity of the person whom you contend initiated the communication: (c) the identity of all persons present at the time of the communication; and (d) the time, date, and place of the communication.

7. As used herein, the term "YOU" and "YOUR" shall refer to the Defendant Sheriff Warren, his agents, employees, attorneys, accountants, investigators, or anyone else acting on his

behalf.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Produce any and all evidence regarding the cost of Macon County Greyhound Park d/b/a Victoryland.

2. Produce any and all evidence that Macon County Greyhound Park d/b/a Victoryland cost at least $15 million.

3. Produce the reports of the campaign contributions made to Sheriff David A. Warren for his past two campaigns.

4. Produce evidence showing when the licenses of South Macon County Elementary School and Washington Public School became inactive.

5. Produce the Class A Bingo License and application for the Nile NCO Club.

6. Produce the contracts held between all current Class B Bingo license holders and their qualified location.

7. Produce the budget for the Macon County Sheriff's Department for the years of 2003, 2004, 2005 and 2006.

8. Produce any and all documents indicating the partners, members and/or stockholders of Macon County Greyhound Park d/b/a Victoryland that own collectively at least 2/3 of the company.

9. Produce any and all documents indicating the amount of money that has flowed to the non-profit organizations as a result of bingo gaming in Macon County during the years of 2003, 2004, 2005 and 2006.

10. Produce the gross receipts of Macon County Greyhound Park d/b/a Victoryland from

2003, 2004, 2005 and 2006 .

11. Produce the Macon County Sheriff's Department's complete files for each current Class B Bingo License holder in Macon County, Alabama as it relates to bingo gaming in Macon County, Alabama.

12. Produce any and all investigative documents regarding the Macon County Sheriff's Department investigations of Class B Bingo applicants from 2003 to 2006 as it relates to bingo gaming in Macon County, Alabama.

WHEREFORE PREMISES CONSIDERED, the Plaintiffs respectfully request that this Court shorten the time allowed for responses to its follow-up discover requests to the Defendant.

Respectfully Submitted,

R. Salaam-Jones

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served upon the following via properly addressed, postage prepaid United States mail, this the 16th day of August, 2006.

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